

**UNITED STATES DISTRICT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION

Plaintiff,

v

JOHN W. HIGGINS, MARTHA R. HIGGINS; and
UNITED STATES OF AMERICA,

Defendants.

UNITED STATES OF AMERICA,

Counterclaim/Crossclaim Plaintiff,

v

JOHN W. HIGGINS, MARTHA R. HIGGINS;

Crossclaim Defendants,

and

JPMORGAN CHASE BANK, N.A,

Counterclaim Defendant.

**PLAINTIFF JPMORGAN CHASE BANK, N.A.'S CONCURRENCE WITH THE
UNITED STATES OF AMERICA'S MOTION FOR SUMMARY JUDGMENT AND
NOTICE OF SETTLEMENT AGREEMENT**

For the reasons set forth in the United States of America's motion for summary judgment and brief in support, (RE 83, 84), as well as its Notice of Attached Settlement Agreement between the United States of America and Plaintiff JPMorgan Chase Bank, N.A. ("Chase") (RE 81, 81-1), Chase hereby confirms its concurrence in the relief sought by the United States of America, consistent with the terms of the settlement agreement. (RE 81-1.) Chase denies as untrue the unfounded assertions of Defendants John and Martha Higgins with respect to Chase in their response to the United States of America's motion for summary judgment. (*See* RE 86, PageID # 489, 490, 491, 492.)

Dated: September 24, 2024

Respectfully submitted,

/s/ Mark J. Magyar

Mark J. Magyar (P75090)

DYKEMA GOSSETT PLLC

Attorneys for Plaintiff JPMorgan Chase
Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all registered recipients, and a copy of the foregoing was sent to Defendants John W. and Martha R. Higgins by U.S. Mail to 50102 Alpine Blvd., New Buffalo MI 49117.

/s/ Mark J. Magyar (P75090)